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**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

DANIEL D'AMBLBY; AARON  
WOLKIND; STEVE HARTLEY;  
RICHARD SCHWETZ; JOBEL  
BARBOSA; MATTHEW REIDINGER;  
JOHN HUGO; SEAN-MICHAEL DAVID  
SCOTT; THOMAS LOUDEN;  
ZACHARY REHL; AMANDA REHL;  
K.R., a minor, by and through her father  
ZACHARY REHL and her mother  
AMANDA REHL; MARK ANTHONY  
TUCCI,

Plaintiffs

v.

Civil Action No: 2:20-cv-12880-  
JMV-JSA

Honorable John Michael Vazquez  
United States District Judge

**DEFENDANTS TWITTER, INC.  
AND VIJAYA GADDE'S NOTICE  
OF MOTION TO DISMISS WITH  
PREJUDICE COUNTS VIII-XII  
OF PLAINTIFFS' FIRST  
AMENDED COMPLAINT AND  
CROSS-CLAIMS FILED BY CO-  
DEFENDANT COHEN, WEISS  
AND SIMON, LLP**

CHRISTIAN EXOO a/k/a ANTIFASH  
GORDON; ST. LAWRENCE  
UNIVERSITY; TRIBUNE PUBLISHING  
COMPANY, LLC; NEW YORK DAILY  
NEWS; VIJAYA GADDE; TWITTER,  
INC.; COHEN, WEISS AND SIMON  
LLP; UNNAMED ASSOCIATES 1-100,

Defendants.

## ORAL ARGUMENT REQUESTED

**Motion Date: July 6, 2021**

To:

<p><b>PATRICK TRAINOR, ESQ.</b> Law Office of Patrick Trainor, Esq., LLC 848 Paterson Avenue East Rutherford, NJ 07073 Telephone: 201-777-3327 Email: pt@ptesq.com <i>Attorney for Plaintiffs</i></p>	<p><b>MONICA C. BARRETT, ESQ.</b> Bond Schoeneck &amp; King, PLLC 600 Third Avenue, 22nd Floor New York, NY 10009 Telephone: 646-253-2314 Email: mbarrett@bsk.com <i>Attorneys for Defendant, St. Lawrence University</i></p>
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**PLEASE TAKE NOTICE** that on July 6, 2021, or on a date and time to be set by the Court, Defendants Twitter, Inc. and Vijaya Gadde (“Defendants”), by and through their attorneys, Gibbons P.C. (by Lawrence S. Lustberg and Lauren James-Weir) and Wilmer Cutler Pickering Hale and Dorr LLP (by Ari Holtzblatt and Patrick Carome) (*pro hac vice*), shall move before the United States District Court for the District of New Jersey, located at Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Newark, NJ 07102, for the entry of an Order pursuant to F.R.C.P. 12(b)(6) dismissing with prejudice Counts VIII-XII of Plaintiffs’ First Amended Complaint and the cross-claims previously filed by Co-Defendant Cohen, Weiss and Simon, LLP.

**PLEASE TAKE FURTHER NOTICE** that in support of the within Motion, Defendants shall rely upon their Memorandum in Support of Motion to Dismiss with Prejudice Counts VIII-XII of Plaintiffs’ First Amended Complaint and Cross-Claims Filed by Co-Defendant Cohen, Weiss, and Simon, LLP, and the Declaration of Ari Holtzblatt, Esq. submitted herewith.

**PLEASE TAKE FURTHER NOTICE** that a proposed form of Order is also submitted herewith.

Dated: April 22, 2021

By: /s/ **Lawrence S. Lustberg**  
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Twitter, Inc.*